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PACIFIC  **TELESIS**
Group - Washington

August 10, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

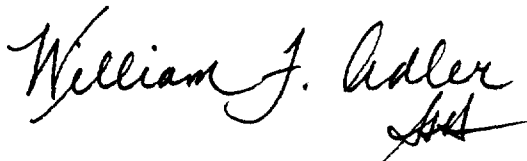
Dear Mr. Caton:

Re: *ET Docket No. 93-7 - Implementation of Section 17 of the Cable Television Consumer Protection and Competition Act of 1992; Compatibility Between Cable Systems and Consumer Electronics Equipment*

On behalf of Pacific Telesis Group, Pacific Bell, and Nevada Bell, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

No. of Copies rec'd 46
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 10 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Implementation of Section 17 of the)
Cable Television Consumer Protection)
and Competition Act of 1992)

Compatibility Between Cable Systems)
and Consumer Electronics Equipment)

ET Docket No. 93-7

COMMENTS OF PACIFIC TELESIS GROUP, PACIFIC BELL AND NEVADA BELL

Pacific Telesis Group, Pacific Bell and Nevada Bell ("the Pacific Companies") submit their comments in response to the Supplemental Comments of the Cable-Consumer Electronics Compatibility Advisory Group ("Advisory Group"), dated July 21, 1993 ("Supplemental Comments") in the above-captioned docket.¹

The Supplemental Comments are the result of the Advisory Group's continuing response to the statutory directive of Section 17 of the 1992 Cable Act² that the cable and consumer electronics equipment industries consult with the Commission about the compatibility of each industry's outputs. Congress

¹ Comments Invited on Industry Proposal for Compatibility Between Cable Systems and Consumer Electronics Equipment, Public Notice, ET Docket No. 93-7, released July 26, 1993.

² The Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, 106 Stat. 1460 (1992).

intended to ensure that cable subscribers could enjoy innovative features and functions in the use of television receivers and video cassette recorders ("VCRs") while also enabling the cable industry to protect against theft of service.

In its Supplemental Comments, the Advisory Group offers both short-term and longer-term recommendations. The Advisory Group acknowledges that its longer-term recommendations can bring substantial changes in the relationship between cable systems and consumer electronics products.³ For that reason, it is vitally important that the Commission also consider the relationship of those longer-term recommendations vis-a-vis newer video delivery alternatives. Congress' directive that consumer electronics and cable industries should consult to assist the Commission should be read broadly to extend participation to include non-traditional cable delivery system operators. Video consumer electronics equipment must be compatible not only with the traditional modes of video service delivery but also with newer service delivery means such as DBS, TVRO, video dialtone and wireless systems. The Commission should encourage active participation by all segments of the video delivery industry that will involve telecommunications via consumer electronics such as televisions and VCRs. Involvement in the development of

³ Supplementary Comments, p. 6.

standards and interfaces by all market participants is the only way to ensure compatibility in the future -- especially given the clear trend of technological convergence.

Respectfully submitted,

PACIFIC BELL
NEVADA BELL



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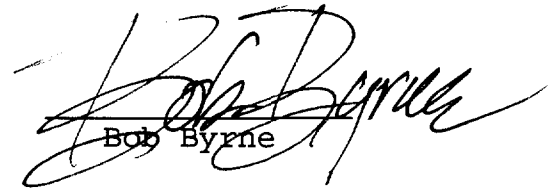
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Their Attorneys

Date: August 10, 1993

CERTIFICATE OF SERVICE

A copy of the comments from Pacific and Nevada Bell for FCC ET Docket 93-7 regarding the "compatability of consumer electronic equipment with CATV system signals" proceeding was mailed or delivered to the accompanying list of parties on August 10, 1993:



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